

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER)
COMPANY FOR RATE ADJUSTMENT) Administrative
) Case No. 2005-00341

MOTION FOR FULL INTERVENTION

Comes now Kentucky Association for Community Action, Inc. (KACA), pursuant to 807 KAR 5:001 Section 3(8), and files this Motion for Full Intervention in the above-referenced proceeding. In support of this motion, KACA states as follows:

1. KACA is a Kentucky non-profit, 501(c)(3) public interest corporation which represents Kentucky's twenty three (23) Community Action Agencies. KACA operates the Low Income Home Energy Assistance Program (LIHEAP) in all 120 Kentucky counties and provides assistance to 150,000 low income households in the state each year.
2. KACA also provides technical assistance on an on-going basis to the state's four Demand Side Management (DSM) Programs operated by American Electric Power, Louisville Gas and Electric, Union Light Heat and Power, and Western Kentucky Gas. These programs provide a variety of conservation services for low income households.
3. In this proceeding, the Commission will examine the rates of Kentucky Power Company, a subsidiary of American Electric Power. It is important that low

income assistance programs be strengthened, not weakened. Low income households affected by the decisions in this case will be represented by KACA in this proceeding.

4. KACA will present testimony from Kip Bowmar, Executive Director of KACA, as well as other witnesses not yet identified.
5. KACA's intervention is likely to present issues and facts that will not be adequately addressed or represented by any other party and will be helpful to the Commission in fully considering the matters without unduly complicating or disrupting this proceeding.
6. KACA respectfully requests that it be granted leave for full intervention and to participate fully as a party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross examine witnesses, present argument and file briefs as allowed by the Commission.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served on the

following persons on this the 18th day of October, 2005.

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